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May 20, 1998

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
1919 M Street, N.W. – Room 222  
Washington, D.C. 20554

Re: *Ex parte*, CC Docket No. 97-121, Application of SBC Communications, Inc., Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services in Oklahoma

Dear Ms. Roman Salas:

Please be advised that on May 19, 1998 Nancy Dalton, Jodie Donovan-May, Joyce Davidson, Russell Morgan, and Frank Simone of AT&T and Daniel Meron of Sidley and Austin met with Melissa Newman, Audrey Wright, Jake Jennings, William Agee, and David Kirschner of the Commission's Common Carrier Bureau staff in connection with the above-referenced proceeding. The purpose of the meeting was to provide the staff with AT&T's view of the state of operations support system development and implementation in the Southwestern Bell Telephone Company territory. The attached documents outline the topics discussed during the meeting.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

ATTACHMENT

cc: M. Newman  
A. Wright  
J. Jennings  
D. Kirschner

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# SWBT OSS UPDATE

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# Pre-Ordering

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- Lack of integrated pre-order/ordering functionality with the LEX ordering platform
- Industry standard pre-ordering capability not yet committed
- Lack of parity in response time
- Discriminatory access (back end legacy systems/ customer service records)

OSS

# Ordering & Provisioning--EDI

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- Commercial availability yet to be demonstrated
  - only one CLEC using EDI (Ameritech for resale)
  - no internal testing documentation
  - 77 percent of CLEC orders sent manually
  - 99 percent of total orders were resale
- Inadequacies of business rules/ mapping requirements and transaction sets
  - field requirements are questionable

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# Ordering & Provisioning--EDI

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- Requirements will change as flow through is developed and incorporated
  - first phases of flowthrough reported to be available 4/30/98
- Change control process for EDI still under negotiation

## OSS

# Ordering & Provisioning--Interim Proprietary Systems

- Resistance and substantial delay implementing PUC-ordered interim EASE solution for UNEs
- Dual entry involved in access to proprietary systems (EASE/LEX)
- Inadequacy of LEX as retail environment sales tool (low volume use only)
- Electronic flow through is not operational
  - high fall out rate via EASE (30-50 percent)
  - high fall out rates projected by SWBT for LEX
  - failure to track and communicate errors

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## Ordering & Provisioning--Interim Proprietary Systems

- Electronic flow through is not operational
  - high fall out rate via EASE (30-50 percent)
  - high fall out rates projected by SWBT for LEX
  - failure to track and communicate errors
- No change control process

## OSS

# Ordering & Provisioning--Policy Issues

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- Disconnect/new connect processing requirements
  - customer impacts
  - discriminatory processing
- No electronic ordering capabilities for complex services
- No direct access to SORD at parity with SWBT retail access



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## Maintenance & Repair

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- Lack of mechanized loop testing for non-POTS service
- No demonstrated mechanized loop testing access for UNEs

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# Billing

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- Delay in posting orders to billing systems
  - SWBT continuing to bill customers 2 to 6 days after conversion
- Paper format for some components of UNE bill
- Lack of capability to deliver usage information to allow terminating access and originating 800 access records

## OSS

# Coopers & Lybrand Study

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- Only examined capacity of SBC's preordering/ordering systems
- Did not analyze capability or performance of systems
- Revealed deteriorating account management support
- Revealed gaps in CLECs' expectations regarding training

## UNEs

# Access to UNEs

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- Life after combinations -- expiring terms
- Lack of methods and procedures for access to combine elements
- No direct access to the central office
- No recent change alternative
- No alternative that does not involve ownership/control of network facility

## UNEs

# Licensing

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- Discriminatory requirement that CLECs obtain separate licenses
- Licensing requirement extended to OSS in new SGAT provisions